



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JMM/SK
F.#2013R00948

*610 Federal Plaza
Central Islip, New York 11722*

May 1, 2015

By ECF

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Re: United States v. Philip Kenner & Tommy Constantine
Criminal Docket No. 13-607(JFB)

Dear Counsel:

Pursuant to Federal Rule of Criminal Procedure 16(a)(1)(G), this is to notify you that the government intends to call Forensic Document Examiner John Paul Osborn to testify that in his opinion, the purported signature of John Kaiser on the consulting agreements that were the subject of Mr. LaRusso's recent request for particulars are both attempted simulations and not authentic.

Copies of Mr. Osborn's resume and qualifications. As you know, Mr. Osborn has been qualified as an expert in handwriting and document analysis repeatedly in this district and elsewhere. Also attached is a list of the 31 cases in which he has most recently

been qualified as an expert since 2011.

Respectfully submitted,

KELLY T. CURRIE
Acting United States Attorney

/S/

By:

James Miskiewicz
Saritha Komatireddy
Assistant U.S. Attorneys

cc: Clerk of the Court (JFB)(w/o enclosures)